

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Plaintiffs request leave to file a second amended complaint. In support, they state:

1. This motion is filed within the time allowed for amended pleadings. ECF No. 87.
 2. Plaintiffs filed their complaint on September 22, 2017. ECF No. 1.
 3. Plaintiffs filed their first amended complaint on September 28, 2017. ECF No. 9.
 4. Plaintiffs wish to file a second amended complaint to clarify and detail the policies that they challenge in light of the further information, including testimony at the hearing on their motion for preliminary injunction.
 5. No party will be prejudiced by allowing Plaintiffs to file a second amended complaint. The parties have only recently begun conducting discovery, and this motion is made within the time allowed by the scheduling order, as extended, to amend pleadings.
 6. A copy of Plaintiffs' proposed second amended complaint is attached hereto.

WHEREFORE Plaintiffs request leave to file their second amended complaint.

Respectfully submitted,

/s/ Anthony E. Rothert
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Certificate of Service

A copy of the foregoing filed via CM/ECF and thereby made available to all counsel of record on August 20, 2018.

/s/ Anthony E. Rothert